## **Chart of Pending District Court FTCA Family Separations Cases Non-Plaintiff Specific Discovery** Notes related to volume and subject matter of documents No. **Case Name Docket Produced Voluntarily Beyond Common Non-Plaintiff Specific Discovery Ordered** produced beyond the Common Discovery Number Discovery Copies of contracts with non-government shelters in Los Angeles No A.E.S.E. v. United States 21-cv-00569 Yes 1 and Bernalillo (New Mexico) counties 100-200 pages. No. Only Plaintiff specific and common 21-cv-00780 A.F.P.v. United States No 2 discovery produced. Aguilar/Morales v. United Discovery not commenced as of 10.31.23. 3 23-cv-00247 No No States Regional policy discovery as to USBP El Paso Sector and ICE El Paso 19-cv-00481 No A.I.I.L. v. Sessions et al. Yes 4 Field Office. Volume is approximately 4,818 documents. N/A-Original case in which Common N/A-Original case in which Common A.P.F. v. United States 20-cv-00065 5 Discovery Produced. Discovery Produced. 21-cv-00215 7 B.A.D.J. v. United States No No B.Y.C.C. v. United States 8 22-cv-06586 No No No discovery produced as of 11.1.2023. 9 Caal v. United States 23-cv-598 No-only common discovery produced. No 21-cv-00469 No discovery produced as of 10.31.2023. 10 No Nο C.D.A. v. United States

N/A-Original case in which Common

Discovery Produced.

No

No

N/A-Original case in which Common

Discovery Produced.

No

No

11

12

13

C.M. v. United States

C.M.-D.V. v. United States

D.A. v. United States

19-cv-05217

21-cv-00234

22-cv-295

## **Chart of Pending District Court FTCA Family Separations Cases Non-Plaintiff Specific Discovery** Notes related to volume and subject matter of documents No. **Case Name Docket Produced Voluntarily Beyond Common Non-Plaintiff Specific Discovery Ordered** produced beyond the Common Discovery Number Discovery Discovery produced to date includes: Common Discovery, Plaintiffspecific discovery, Certain documents tracking family separations in the sector where plaintiffs were separated (RGV), Certain ORR D.J.C.V. v. United States 20-cv-05747 Yes-Dkt. 152 policy documents, Certain ICE policy documents, A couple policy 14 Yes documents specific to the RGV Sector/the USAO in the Southern District of Texas relating to prosecution referrals/prosecutions. Volume is about 7,000 documents on top of common discovery. No-only common discovery and plaintiff 15 E.C.B. v. United States 22-cv-00915 No specific discovery produced. Eduardo I.T. v. United States 16 22-cv-5333 No No No-only common discovery produced as 17 E.L.A. v. United States 20-cv-1524 No of 10.31.23. No-only common discovery and plaintiff 21-cv-00029 18 E.S.M. v. United States No specific discovery produced. Discovery not commenced as of 11.14.23. 19 F.C.C. v. United States 23-cv-03146 Nο No Yes-Produced the Rio Grande Valley Rio Grande Valley policy discovery is approximately 6000 22-cv-884 20 Flores Benitez v. Miller et al. No policy discovery. documents. No-only Common Discovery produced. 21 F.R. v. United States 21-cv-00339 No Fuentes-Ortega v. United No-only common discovery and plaintiff 22-cv-0449 22 No specific discovery produced. States Gonzales De Zuniga v. 23 23-cv-00162 No No **United States**

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Chart of Pending District Court FTCA Family Separations Cases									
No.	Case Name	Docket Number	Non-Plaintiff Specific Discovery Produced Voluntarily Beyond Common Discovery	Non-Plaintiff Specific Discovery Ordered	Notes related to volume and subject matter of documents produced beyond the Common Discovery				
24	J.A.L.C. v. United States	22-cv-06587	No	No	No discovery produced as of 11.1.2023.				
25	J.C.O.C. v. United States	23-cv-05268	No	No	Discovery has not commenced. Complaint just filed on 10.16.23.				
26	J.J.P.B. v. United States	7:23cv133	No	No	Discovery has not commenced.				
27	J.P. v. United States	22-cv-00683	No	No	No discovery produced.				
28	J.P./M.A. v. United States	23-cv-01136	No-only common discovery produced	No					
29	J.R.G. v. United States	22-cv-05183	No-only common discovery produced	No					
30	K.O. v. United States	20-cv-12015	No	No					
31	Leticia v. United States	22-cv-7527	No	No	Discovery has not commenced.				
32	M.A.N.H. v. United States	23-cv-00372	No	No	Discovery has not commenced.				
33	M.M.C. v. United States	23-cv-00158	No	No	Discovery has not commenced.				
34	M.S.E. v. United States	22-cv-01242	No	No	Discovery has not commenced.				
35	N.R. v. United States	23-cv-00201	No-only common discovery and plaintiff specific discovery produced.	No					

Chart of Pending District Court FTCA Family Separations Cases									
No.	Case Name	Docket Number	Non-Plaintiff Specific Discovery Produced Voluntarily Beyond Common Discovery	Non-Plaintiff Specific Discovery Ordered	Notes related to volume and subject matter of documents produced beyond the Common Discovery				
36	Nunez Euceda v. United States	20-cv-10793	Yes	No	Transcripts of policy depositions taken in CM/APF; draft introduction by AG Sessions in 2017 for forward to an article and memos to prosecutors; CBP Hotel Room Short Term Custody policy; Transport, Escort, Detention and Search Policy (public document); 2 CPB Policies on zero tolearance for sexual abuse and assault; INS Law of Search Manual M-69; CBP Reno v. Flores Compliance; CBP zero tolerance memo re prosecution; CBP memo re increasing prosecution of immigration violations; blank ICE I-216 workbook instructions for Hounduras Removal Mission (approximately 6,000 documents including transcripts and exhibits thereto)				
37	P.C.J. v. United States	23-cv-00780	No	No	No discovery initated yet.				
38	P.G. v. United States	21-cv-04457	Yes	Yes	Approximately 175K pages worth of additional non-plaintiff specific discovery. The most significant volume has been (1) HHS documents related to communications about the policy, and (2) ICE documents related to reunification issues.				
39	R.J.P. v. United States	22-cv-06588	No	No	No discovery produced as of 11.1.2023.				
40	R.L.L. v. United States	23-cv-4792	No	No	Discovery has not commenced.				
41	R.Y.M.R./Castro v. United States	20-cv-23598	Yes	Yes. No written order. Judge ruled from the bench.	300 pages of documents related to ICE's family separation policy for Harlingen, El Paso, and Phoenix were produced. This case involved an ICE separation.				
42	S.E.B.M v. United States	21-cv-00095	No	No	motion to dismiss granted; motion for reconsideration denied.				
43	S.M.F. v. United States	22-cv-01193	No-only common discovery produced	No					
44	W.P.V v. United States	3:23-cv-00074	No	No	No discovery has been produced in this case.				